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SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737

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FILED

APPLICATION OF SOUTHWESTERN	§	
ELECTRIC POWER COMPANY FOR	§	
CERTIFICATE OF CONVENIENCE	§	BEFORE THE STATE OFFICE
AND NECESSITY AUTHORIZATION	§	OF
AND RELATED RELIEF FOR THE	§	ADMINISTRATIVE HEARINGS
ACQUISITION OF WIND GENERATION	§	
FACILITIES	§	

**CITIES ADVOCATING REASONABLE DEREGULATION'S
FIRST SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") First Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 816 Congress Avenue, Suite 950, Austin, Texas 78701, within twenty (20) days of service hereof or no later than **September 18, 2019**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning

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the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned

counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

816 Congress Avenue, Suite 950

Austin, Texas 78701

512-474-1492 (Voice)

512-474-2507 (Fax)

By: 

Alfred R. Herrera

State Bar No. 09529600

aherrera@herrerlawpllc.com

Brennan J. Foley

State Bar No. 24055490

bfoley@herrerlawpllc.com

Sergio E. Herrera

State Bar No. 24109999

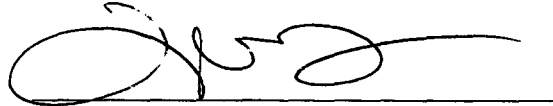
sherrera@herrerlawpllc.com

service@herrerlawpllc.com

**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I certify that I have served a copy of *CARD's First Set of Requests for Information to SWEPCO* upon all known parties of record by fax and/or first class mail on this the 29th day of August 2019.

A handwritten signature in black ink, appearing to read 'Leslie Lindsey', is written over a horizontal line.

Leslie Lindsey

EXHIBIT A

**SOAH DOCKET NO. 473-19-6862
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**CITIES ADVOCATING REASONABLE DEREGULATION'S
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SOUTHWESTERN ELECTRIC POWER COMPANY**

- 1-1. Provide the RFP documents used for selection of the proposed wind energy facilities.
- 1-2. Provide the bid evaluation results and rankings leading to selection of the proposed wind energy facilities, along with specific reasons for rejecting any wind energy bids.
- 1-3. Provide the underlying modeling assumptions and results (e.g., energy production, revenue requirements and market revenues) for each year of the analyses of the selected wind energy facilities and each other qualified wind resource bid.
- 1-4. Provide a map showing the location of the selected wind energy facilities and other proposed wind energy facilities that were not selected, SWEPCO's existing wind energy facilities, and the previously proposed Wind Catcher facilities.
- 1-5. Identify and describe the status of regulatory proceedings addressing approval of SWEPCO's ownership share of the wind energy facilities at issue in this case, along with the anticipated regulatory approval dates.
- 1-6. Provide PSO's and SWEPCO's most recent IRPs and identify the level of new wind energy evaluated and reflected in the five-year action plans of such studies.
- 1-7. Provide SWEPCO's system energy mix (i.e., gas, coal, wind, purchases, etc.) for the last three calendar years and as forecasted for the first ten years of commercial service of the proposed wind energy facilities.

- 1-8. Provide SWEPCO's system energy mix (i.e., gas, coal, wind, purchases, etc.) for the last three calendar years and as forecasted for the first ten years of commercial service of the proposed wind energy facilities.
- 1-9. Provide SWEPCO's forecasted system energy mix for the first fifteen years of the study period of the Company's most recent IRP.
- 1-10. Identify major operating or financial risks associated with SWEPCO's ownership of the proposed wind energy facilities, along with results of any sensitivity analyses addressing the impact of these risk factors.
- 1-11. Provide base case and sensitivity case commodity price forecasts (including carbon) used for each year of cost/benefit analyses supporting the selection of the proposed wind energy facilities.
- 1-12. Provide base case and sensitivity case commodity price forecasts (including carbon) used for each year of cost/benefit analyses supporting SWEPCO's most recent IRP.
- 1-13. Provide base case and sensitivity case commodity price forecasts (including carbon) used for each year of cost/benefit analyses supporting SWEPCO's previously proposed Wind Catcher project.
- 1-14. Explain the primary advantages of SWEPCO's ownership of the proposed wind energy facilities rather than purchasing wind energy under contract from other providers.
- 1-15. Provide the annual net generation and average capacity factors of each existing SWEPCO wind energy resource for the last three calendar years, along with the location of such resources.
- 1-16. Provide the energy produced (MWh), energy costs and congestion costs incurred for each existing SWEPCO wind energy resource for the last three calendar years, along with the location of such resources.
- 1-17. Provide the total volume (MWh) and associated revenues for REC sales supplied from existing SWEPCO energy resources for the last three calendar years.

- 1-18. Identify annual wind energy curtailments (MWh) due to transmission constraints or other factors for each existing SWEPCO wind energy resource for the last three calendar years, along with the location of such resources.
- 1-19. Provide the forecasted annual average cost (\$/MWh) and average market energy revenue (\$/MWh) for each year of the base case analysis supporting the selection of each of the proposed wind energy facilities.
- 1-20. Provide the forecasted annual average cost (\$/MWh) and average market energy revenue (\$/MWh) for each year of the base case analysis supporting the previously proposed Wind Catcher project wind energy facilities.
- 1-21. Provide a comparison of the major financial and operational guarantees offered by SWEPCO for the proposed wind energy facilities in this case to guarantees offered by the Company for the previously proposed Wind Catcher project.
- 1-22. Provide a comparison of the base case economic benefits of SWEPCO's share of the proposed wind energy facilities in this case to the forecasted base case benefits of SWEPCO's share of the previously proposed Wind Catcher project for each year of the base case analyses for these projects.
- 1-23. Provide a comparison of the base case capital cost estimate for SWEPCO's share of the proposed wind energy facilities in this case to the capital cost estimate for SWEPCO's share of the previously proposed Wind Catcher project for each year of the base case analyses for these projects.
- 1-24. Provide a comparison of the base case revenue requirements for SWEPCO's share of the proposed wind energy facilities in this case to the capital cost estimate for SWEPCO's share of the previously proposed Wind Catcher project for each year of the base case analyses for these projects.
- 1-25. Provide a comparison of the base case net generation and capacity factors for SWEPCO's share of the proposed wind energy facilities in this case to the capacity factors and net generation for SWEPCO's share of the previously proposed Wind Catcher project for each year of the base case analyses for these projects.

- 1-26. Provide a comparison of the base case congestion costs for SWEPCO's share of the proposed wind energy facilities in this case to the congestion costs for SWEPCO's share of the previously proposed Wind Catcher project for each year of the base case analyses for these projects.
- 1-27. Provide a comparison of the base case market energy sales revenues produced from SWEPCO's share of the proposed wind energy facilities in this case to the market energy sales revenues produced from SWEPCO's share of the previously proposed Wind Catcher project for each year of the base case analyses for these projects.
- 1-28. Provide a comparison of the base case PTCs for SWEPCO's share of the proposed wind energy facilities in this case to the PTCs for SWEPCO's share of the previously proposed Wind Catcher project for each year of the base case analyses for these projects.
- 1-29. Provide a comparison of the nameplate ratings (MW) and assumed firm capacity rating of SWEPCO's share of the proposed wind energy facilities to SWEPCO's share of the previously proposed Wind Catcher project.